UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DORMAN ANGEL, et al.   :   Case No. 1:01-CV-467
                                       (BECKWITH, JUDGE)

     Plaintiffs   :
                                       AMENDED
     vs.   :   MOTION OF DEFENDANT PACE LOCAL 5-1967
                                       TO RESET CALENDAR

PACE LOCAL 5-1967, and   :
PAPER, ALLIED INDUSTRIAL,
CHEMICAL & ENERGY WORKERS
INTERNATIONAL UNION,   :
AFL-CIO, and

INTERNATIONAL PAPER COMPANY
and   :

SMART PAPER, LLC   :

          Defendants

     Defendant PACE Local 5-1967 moves to reset calendar for

pretrial to a date later than May 25, 2005, and trial to a date

later than June 13, 2005. The following memorandum states why.

     The original calendar dates of April 29, 2005 for pretrial and

May 16, 2005 for trial were available to the undersigned counsel

for defendant PACE Local 5-1967. When the Court granted Plaintiffs'

motion to extend discovery cutoff from December 31, 2004 to January

31, 2005, with extensions granted, the dates of pretrial and trial

were correspondingly moved back to May 25, 2005, and June 13, 2005.

     The undersigned has been notified that meetings are scheduled

the week of June 13, 2005, at Chateau La Mer II in Destin, Florida,

to survey Hurricane Ivan damage and repairs pending. As Vice

President of this condo association his participation in these

meetings and examinations of repair of damage completed and pending

is necessary. For any trial date later than the week of June 13,

2005, the undersigned will be available for trial.

Counsel for all parties have agreed to this request for

extension of the trial date, and counsel for defendant PACE

International Union joins in this motion.

/s/Robert I. Doggett
Robert I. Doggett (0016849)
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CERTIFICATE OF SERVICE

The undersigned certifies that he served copies of the above
document by the Clerk's CM/ECF system upon counsel for all parties.

/Robert_I._Doggett_____
Robert I. Doggett (0016849)
Trial Attorney for PACE Local 5-1967